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Attorneys for Creditors
MARINA GELMAN and MIKHAIL GELMAN

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case - Jointly Administered)

**NOTICE OF HEARING ON MOTION FOR
RELIEF FROM THE AUTOMATIC STAY
AND ABSTENTION PURSUANT TO 28
U.S.C. 1334(c)(1); OBJECTION TO THE
BANKRUPTCY COURT ADJUDICATING
MOVANTS' PERSONAL INJURY
CLAIMS**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-3008 (DM).

Date: April 24, 2019

Time: 9:30 a.m.

Ctrm: Hon. Dennis Montali
450 Golden Gate Avenue
16th Floor, Courtroom 17
San Francisco, CA 94102

TO THE DEBTORS AND OTHER INTERESTED PARTIES:

PLEASE TAKE NOTICE that on April 24, 2019, at 9:30 a.m., before the Honorable Dennis
Montali, United States Bankruptcy Judge, in Courtroom 17 of the United States Bankruptcy Court,

1 450 Golden Gate Avenue, 16th Floor, San Francisco, California, Marina Gelman and Mikhail
2 Gelman, through their undersigned attorney, will move the Court for its Order:

3 1. Terminating, annulling, modifying, or conditioning the automatic stay of 11 U.S.C.
4 §362(a) to allow the Gelmans to prosecute to judgment their lawsuit for personal injury against the
5 Pacific Gas and Electric Company (“PG&E”), the City and County of San Francisco (“San
6 Francisco”), and Blue Plantain, LLC, pending in the San Francisco County Superior Court, Case
7 No. CGC-17-556763 (“the Lawsuit”);

8 2. Abstaining pursuant to 28 U.S.C. § 1334(c)(1);

9 3. Providing that the 14-day stay prescribed by Federal Bankruptcy Rule 4001(a)(3)
10 shall not apply to the Court’s order issued pursuant to this motion; and

11 4. For such other and further relief as this Court deems just and proper pursuant to this
12 motion.

13 Creditors object to the Bankruptcy Court being the forum for the trial of their personal injury
14 claims pursuant to 28 U.S.C. §157.

15 This motion is brought pursuant to 11 U.S.C. §362(d)(1) for cause. This motion is
16 based upon this Notice, the Points and Authorities, the Request for Judicial Notice, and the
17 Declaration of David W. Wessel filed in support of this motion concurrently with this notice, upon
18 all other pleadings and papers on file herein, and upon such oral and documentary evidence as may
19 be presented by the Gelmans at the hearing on this motion.

20 Pursuant to Local Rule 4001-1(a) respondent(s) opposing the motion shall appear personally
21 or by counsel at the preliminary hearing. Respondent(s) will not be required to, but may, file
22 responsive pleadings, points and authorities, and declarations for any preliminary hearing.

23 IN THE EVENT THAT NEITHER THE DEBTOR NOR ITS COUNSEL, NOR ANY
24 OTHER INTERESTED PARTY APPEARS AT THE HEARING ON THIS MOTION, THE
25 COURT MAY GRANT RELIEF FROM THE AUTOMATIC STAY PERMITTING CREDITORS
26 TO CONTINUE PROSECUTING THE LAWSUIT WITHOUT FURTHER HEARING.

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Attached as Exhibit 1 to this Notice is the Gelmans' proposed form of the Order.

Dated: April 3, 2019

LAW OFFICES OF BORIS E. EFRON

/s/ David W. Wessel
(SBN: 115222)

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EXHIBIT 1

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**ORDER FOR RELIEF FROM THE
AUTOMATIC STAY AND ABSTENTION
PURSUANT TO 28 U.S.C. 1334(c)(1)**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

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16th Floor, Courtroom 17

San Francisco, CA 94102

The motion of Marina Gelman and Mikhail Gelman ("the Gelmans") for relief from the automatic stay and abstention (the "Motion") came on for hearing before the Hon. Dennis Montali, United States Bankruptcy Court Judge, on April 24, 2019. The Court having considered all papers filed in support of the Motion and the _____ opposition, and upon due consideration, and good cause appearing,

